

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2023 APR 21 PM 1:10  
CLERK OF COURT  
SOUTHERN DISTRICT OF NEW YORK

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RICHARD ARJUN KAUL, MD;  
DAVID BASCH, MD;  
JANE DOE; JOHN DOE.

Plaintiffs

v.

CIVIL ACTION.: 23-CV-2016  
(JLR)

INTERCONTINENTAL EXCHANGE; GEICO;  
TD BANK; ALLSTATE INSURANCE COMPANY;  
FEDERATION STATE MEDICAL BOARDS; ARTHUR HENRERER;  
CHRISTOPHER J. CHRISTIE; DANIEL STOLZ;  
ATLANTIC HEALTH SYSTEM; ROBERT HEARY;  
PHILIP MURPHY; GURBIR GREWAL;  
RIVKIN RADLER LAW FIRM; MAX GERSENOFF;  
JANE DOE; JOHN DOE.

**Local Rule 56.1 – Statement  
of Material Facts on Motion  
for Summary Judgment**

Defendants

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**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff Richard Arjun Kaul, MD ("Kaul") respectfully move this Court on May 5, 2023, or as soon thereafter, for an Order, pursuant to F.R.C.P 56, for entry of Summary Judgment against Defendant Robert Heary. In support of this motion, Plaintiff Kaul submit a MEMORANDUM OF LAW/STATEMENT OF ADMITTED FACTS/EVIDENTIAL EXHIBITS.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any papers in opposition to this motion shall be served within 14 days of service of these motion papers

Dated: April 21, 2023:

  
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RICHARD ARJUN KAUL, MD